

February 6, 2006

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S. W.  
Washington, D.C. 20554

RE: FCC Docket EB 06-36  
EB-06-TC-060  
Covista Inc.

Dear Secretary Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, please find attached Covista Inc.'s ("Company") annual compliance certificate for the most recent period as required by section 64.2009 (e) of the Commission's Rules together with a statement of the Company's operating procedures established to ensure compliance with the Commission's Rules and Regulations regarding Customer Proprietary Network Information.

Should you have any questions regarding this filing, please direct them to me at 423.648.9519 or my email which is [tbrinkman@covista.com](mailto:tbrinkman@covista.com).

Sincerely,

A handwritten signature in dark ink, appearing to read 'Tom W. Brinkman', written over a horizontal line.

Thomas W. Brinkman  
Sr. Director – Strategic Planning & Regulatory

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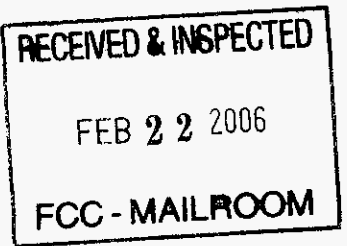
**ANNUAL STATEMENT OF COMPLIANCE AS REQUIRED BY  
SECTION 64.2009 ( C ) OF THE RULES AND REGULATIONS OF THE  
FEDERAL COMMUNICATIONS COMMISSION**

Covista, Inc. (the "Company") has identified three primary areas that, on a daily basis, handle customer proprietary network information ("CPNI"), namely, Billing, Engineering, and Customer Service. All individuals in those departments are required to abide by the Company's Privacy Principles and are educated by the Company concerning Section 222 of the Communications Act of 1934 and the requirements therein.

The education entails: (1) identifying specific customer information that must remain secure, such as usage amounts, calling patterns, and customer specific network design; (2) the proper use, storage and dissemination of this information; and (3) inquiring when doubt exists regarding the type of information that has not been previously discussed.

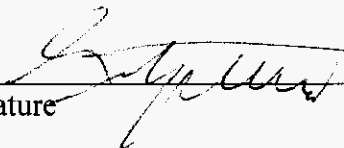
In addition to the above, the Company uses proprietary, multi layered security codes to protect customer information. Only the department directors and the corporate officers possess the code sheet and the dissemination of the sheet is strictly prohibited. No single individual has end-to-end control of the master code list. Without the end-to-end master control list, customers of the company appear solely as a number. If information is accidentally released at any layer, the information does not readily translate into a specific customer profile.

The Company believes that the combination of education and the level of the security coding of customer identities provides sufficient security for CPNI



**ANNUAL CERTIFICATE OF COMPLIANCE AS REQUIRED BY SECTION  
64.2009 (E) OF THE RULES AND REGULATIONS OF THE FEDERAL  
COMMUNICATION COMMISSION**

I, A. John Leach, am President and CEO of Covista Inc. ("Company") and in that capacity I have personal knowledge of the operations of the Company, that the Company has established operating procedures that are adequate to safeguard its customer proprietary network information and, in support of this Certificate, the Company has attached a Statement explaining its operating procedures to insure compliance with the rules as set forth in 47 CFR Ch. 1 § 64.2009

  
\_\_\_\_\_  
Signature

A. John Leach, Jr.  
\_\_\_\_\_  
Printed Name

2/13/06  
\_\_\_\_\_  
Date